- 1			
2 3 4 5 6 7 8 9 10 11 12 13 14	50 W. San Fernando St., Tenth Floor San Jose, California 95113 Telephone: (408) 279-8700 Facsimile: (408) 279-3244 E-Mail: jmcmanis@mcmanislaw.com mreedy@mcmanislaw.com Attorneys for Plaintiffs [Additional Counsel for Plaintiffs Appear on Signature Steven H. FRANKEL (SBN 171919) BONNIE LAU (SBN 246188) SNR DENTON US LLP 525 Market Street, 26th Floor San Francisco, California 94105 Telephone: (415) 882-5000 Facsimile: (415) 882-0300	e Company, and	
15 16 17 18	UNITED STATES DISTRICT COURT		
19			
20	SARAH PEREZ; et al.,) Case No. C06-1962 JW (PSG)	
21	Plaintiffs,) Hon. James Ware	
22 23	v.) STIPULATION AND [PROPOSED]) ORDER REGARDING REPLY	
24	STATE FARM MUT. AUTO. INS. CO. et al.) MEMORANDA IN SUPPORT OF	
	Defendants.	DEFENDANTS' JOINT MOTIONS TOSTRIKE AND TO EXCLUDE AND	
25 26		BRIEFING SCHEDULE ON GEICOMOTION TO DISQUALIFY PLAINTIFF	
27) HILDA RACHEL STEWART	
28		,)	
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STIPULATION

Plaintiffs Sarah Perez, Michelle Lackney, Rachel Stewart and Rachel Hardyck (collectively "Plaintiffs") and Defendants State Farm Mutual Automobile Insurance Company, State Farm Fire and Casualty Company, State Farm General Insurance Company, Allstate Indemnity Company, Allstate Insurance Company, Allstate Property & Casualty Insurance Company, GEICO General Insurance Company, GEICO Casualty Company, GEICO Indemnity Company, Certified Automotive Parts Association, and Liberty Mutual Fire Insurance Company (collectively "Defendants"), by and through their respective undersigned counsel, stipulate and agree as follows:

- 1. On August 29, 2011, Defendants filed the following joint motions ("Joint Motions") that are set for hearing on December 12, 2011 at 9:00 a.m.:
 - (a) Motion to Strike Rebuttal Declaration of Plaintiffs' Purported Expert Donald T. Bashline and to Exclude His Testimony (Docket Entry No. 472);
 - (b) Motion to Exclude Testimony of Plaintiffs' Purported Expert Roger G. Knoll (Docket Entry No. 473); and
 - (c) Motion to Strike Rebuttal Declaration of Plaintiffs' Purported Expert Allen Wood and To Exclude His Testimony (Docket Entry No. 474).
- 2. Pursuant to the Court's September 6, 2011 Order (Docket Entry No. 487), Plaintiffs filed their oppositions to the Joint Motions on September 26, 2011. Defendants' replies in support of the Joint Motions are currently due to be filed on Monday, October 3, 2011.
- 3. Defendants have requested and Plaintiffs agree that the time within which Defendants shall file their replies in support of the Joint Motions be extended by two days -- from Monday, October 3, 2011 to Wednesday, October 5, 2011 -- to accommodate those counsel who are observing the Jewish New Year holiday (from sundown on Wednesday, September 27 through sundown on Friday, September 30, 2011).
- 4. On September 26, 2011, the GEICO defendants filed a Motion to Disqualify Hilda Rachel Stewart From Serving as a Class Representative ("GEICO Motion") (Docket Entry No. 525) that is also set for hearing on December 12, 2011 at 9:00 a.m. Plaintiffs' Opposition to the GEICO

1	Maria de la Contra		
	Motion is currently due on Tuesday, October 11, 2011. Plaintiffs have requested and the GEICO		
2	defendants agree that the time within which Plain	ntiffs shall file their opposition to the GEICO	
3	Motion be extended from Tuesday, October 11, 2	2011 to Thursday, October 13, 2011, and that the	
4	time for the GEICO defendants to file their reply	in support of GEICO Motion be extended from	
5	Tuesday, October 18, 2011 to Thursday, October 20, 2011.		
6	, , , , , , , , , , , , , , , , , , , ,		
7	IT IS SO STIPULATED ON SEPTEMBER 27, 2011.		
8	D UGU	D UGU	
9	By //S// On Behalf of All Plaintiffs	By //S// On Behalf of All Defendants	
9	T M M '	O. H.F. 1.1	
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	-4	4-

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1	[PROPOSED] ORDER
2	PURSUANT TO STIPULATION, IT IS SO ORDERED.
3	Dated: September 29, 2011
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5	James Ubse
6	Apn. James Ware United States District Chief Judge
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CERTIFICATION I, Steven H. Frankel, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Regarding Defendants' Replies in Support of Joint Motions to Strike and to Exclude and Briefing Schedule on GEICO Motion To Disqualify Plaintiff Hilda Rachel Stewart. In compliance with General Order 45.X.B., I hereby attest that counsel for all parties, concurred in this filing. Dated: September 27, 2011 /s/ Steven H. Frankel_ Steven H. Frankel -6-